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ATTORNEYS FOR PLAINTIFF, LISSETTE NUNEZ PAREDES
AND THOSE SIMILARLY SITUATED

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN MATEO
UNLIMITED JURISDICTION

LISSETTE NUNEZ PAREDES,
INDIVIDUALLY AND ON BEHALF OF THOSE
SIMILARLY SITUATED,

PLAINTIFF,

V.

JSN BAY CONTRACT, INC., A
CALIFORNIA CORPORATION, AND DOES 1
THROUGH 10, INCLUSIVE,

DEFENDANTS.

) CASE No. 20-CIV-02362

) **DECLARATION OF ARACELY**
) **RIVERA IN SUPPORT OF**
) **PLAINTIFF'S UNOPPOSED MOTION**
) **FOR APPROVAL OF PAGA**
) **SETTLEMENT**

) **DATE: JUNE 29, 2021**

) **TIME: 8:30 A.M.**

) **DEPT: 4**

) **JUDGE: HON. NANCY L. FINEMAN**

I, Aracely Rivera, declare as follows:

1. I am the President and CEO of JSN Bay Contract, Inc. ("JSN"). I have personal knowledge of the facts stated below, and if called to testify, I would competently testify to them.
2. Prior to June 2020, JSN unintentionally issued wage statements to approximately 46 employees that did not contain the last four digits of the employee's social security number or an employee identification number. Upon being notified of this issue in approximately May or June 2020, JSN promptly corrected this inadvertent error in June 2020. With regard to the meal and rest break penalties sought by Plaintiff Lissette Nunez Paredes, JSN's policies and practices authorized and permitted employees to take compliant meal and rest periods at all relevant times.
3. The COVID-19 pandemic severely impacted JSN's income, which lost more than \$100,000. JSN still has not recovered financially from the effects of COVID-19, and it does not have the ability to pay PAGA penalties in excess of the settlement amount in the lawsuit brought by Plaintiff Lissette Nunez Paredes.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct and that this declaration was executed on May 11th, in SOUTH SAN FRANCISCO, California.

Aracely Rivera
Aracely Rivera